

**IN THE UNITED STATES DISTRICT
COURT FOR THE SOUTHERN
DISTRICT OF OHIO EASTERN
DIVISION**

BRANDON C. HELMAN,

Plaintiff,

v.

**JPMORGAN CHASE BANK,
NATIONAL ASSOCIATION,**

Defendant.

Case No. 2:25-cv-00589-JLG-CMV

HONORABLE JUDGE JAMES L. GRAHAM

**MAGISTRATE JUDGE CHELSEY
M. VASCURA**

PLAINTIFF'S OPPOSITION TO DEFENDANT'S REPLY IN SUPPORT OF ITS MOTION TO DISMISS, RELIEF DEMAND, AND MOTION FOR DISCOVERY

Plaintiff BRANDON CHARLES HELMAN respectfully opposes Defendant JPMORGAN CHASE BANK, N.A. and their legal counsel's Reply in Support of its Motion to Dismiss. The motion again misrepresents not only the Plaintiff's claims of equity mentioned in the original language(s) presented in the Complaint, but also relies heavily on irrelevant opinions by other court(s) in reference to "sovereign citizen" and "vapor money" theories. Neither of these presumptions is present in the aforementioned Complaint by the Plaintiff, and do not represent the views purported by their authorized representative. The Plaintiff's case is based on valid legal claims supported by factual allegations that meet the standards set by *Ashcroft v. Iqbal*, 556 U.S. 662 (2009), and *Bell Atl. Corp. v. Twombly*, 550 U.S. 544 (2007).

Defendant JP MORGAN CHASE BANK, N.A. and their legal counsel have again presented arguments and further affirmed presumptions to distract from the subject matter and real issues in this case, and do not, under such circumstances, justify as grounds for dismissal. The Honorable Court must deny the motion to dismiss and require the Defendant to issue a retraction of damaging libel statements made against and about the Plaintiff and counsel. Irreparable harm and injury/damage has been performed with malicious intent and a demand for relief is absolutely needed under these circumstances. We hereby Motion for Discovery to present collected evidence of the claims made against the Defendant, clarified within "Affidavit: Novation, Orders, Clarification and Statement of Value and Consideration" sent by way of USPS Certified Mail on March 10th, 2025 and again by way of FAX on March 17th, 2025.

Furthermore, the Plaintiff and counsel have evidence of tendered payments to the Defendant in the form of Certified Mailings, and, seek evidence of dishonor of these drafts to balance the account by way of Uniform Commercial Code 3-505. Defendant and counsel are continuing a campaign to violate 18 U.S. Code § 112, hinder due process of law, and must be held

to account for their refusal to cooperate in the investigation of these accounting errors. All Plaintiff's assets and intellectual property have now been moved into a private living trust and this includes the indorsed negotiable instruments in the Defendant's possession. Rights and claims to the equity values of these drafts are retained and sustained, without prejudice, by the authorized representative and Trustee. Plaintiff's counsel now humbly requests to move forward in The Honorable Court in equity, by way of Special Appearance, and Sui Juris.

Additionally, the Defendant and counsel have harmed the Plaintiff's general reputation and protections under 15 U.S. Code § 1681 by failing to discharge the obligations of the United States (18 USC 8). This is absolutely paramount to this case and will be accomplished by the set-off standards presented in Order 8, Rule 6 of the Code of Civil Procedure (CPC), 1908. Plaintiff and their authorized representative are before The Honorable Court with clean hands and are simply here to rectify the situation for equitable outcome of all involved parties. We demand honest dealings and our right to be heard without prejudice.

Dated: July 26th, 2025

RESPECTFULLY SUBMITTED,

BRANDON CHARLES HELMAN

BY: /s/ Brandon C. Helman
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CERTIFICATE OF SERVICE

I hereby certify that on June 28th, 2025, a copy of the foregoing was filed with the Clerk of this Court by way of regular U.S. mail. Further, all counsel of record were served with the same via regular U.S. mail and regular e-mail.

/s/ Brandon C. Helman

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